

**To:** Dee.allen@ldftribe.com[Dee.allen@ldftribe.com]  
**Cc:** rdubey@scblaw.com[rdubey@scblaw.com]; lwawronowicz@ldftribe.com[lwawronowicz@ldftribe.com]; Manville, Jennifer[manville.jennifer@epa.gov]  
**From:** Hanson, Kristen  
**Sent:** Mon 9/26/2016 8:56:09 PM  
**Subject:** FW: Additional LIF data to Haskell Lake Model

Good Afternoon,

New development, Bob sent a warning....

### History

After discussions and emails with Bob and at Bob's direction I had asked Bristol for a cost estimate to contract inclusion of LIF data into the EPA model. Bob's email reply was that a Tribal Contract was needed to include Tribal LIF Data from the source area. Bristol's response to the Tribe's cost estimate request was that no contract was needed and sufficient budget was in place for this task.

Bob had reported that all data was included in the groundwater model, but when viewed on the EPA website his colleague Tom Kady set up, there was no data next to the lake or in the area of the Tribe's VAS work.

Bob has stopped answering the phone months ago and little productive correspondence is coming out of Bob. Regardless, All Bristol Correspondence has been to Bob or included Bob.

In this case, the contractor had called us regarding the completed upload of LIF data and reported that the plume was undefined to the east. The Tribal VAS data both defines the plume to the east and shows that the plume does in fact extend to the lake.

I copied Bob on an email suggesting using the already agreed data (included in thread).

In the past, all data requests went to Bob requesting data (as in the thread). Bob's response has been telling Bristol to directly send me something or telling me to send Bristol something.

Here is Bob's warning....

**From:** Egan, Robert [mailto:egan.robert@epa.gov]  
**Sent:** Monday, September 26, 2016 3:32 PM  
**To:** Hanson, Kristen  
**Cc:** Kamke, Sherry  
**Subject:** RE: Additional LIF data to Haskell Lake Model

Kristen,

I wanted to tell you that we have to be careful to avoid improper communication with EPA's contractor. Because we have very specific rules for how to engage federal contractors, please refrain from sending messages such as the message sent below (on 9/26) directly to Bristol. They can be misconstrued as directing the EPA contractor to do extra work which is not authorized or funded. If this happens, it can put us in non-compliance with the federal acquisition regulations, and EPA would be responsible for the unauthorized costs.

It may be possible to add data to the set for the model, but I would need to check with Bristol on the budget before we move forward and with my project-level contracting officer. This pertains to anything that could be understood as "extra" work for Bristol or subs to perform.

I know that you want the best possible product, but we need to stay within our authorized tasks or get prior approval for changes.

I don't mean to be harsh about this, but our contracting folks are very serious about this topic. I should have made this more clear at an earlier date.

Every SOW that I submit has the following section, which I think of as a warning statement to both me and the contractor:

## **6. Technical Direction**

*The Designated COR is authorized to provide technical direction to the extent allowed under EPAAR (1552.237-71) (APR 1984) (DEVIATION). Other than the Designated COR, only the Project Officer and the Contracting Officer are authorized to provide technical direction. Therefore, the contractor shall not discuss work related to a work assignment with EPA personnel unless the Designated COR, Project Officer or Contracting Officer is present.*

*Technical direction includes: (1) direction to the contractor which assists the contractor in*

*accomplishing the Statement of Work; and (2) comments on and approval/acceptance of reports or other deliverables. Technical direction must be within the contract and the Task Order Performance Work Statement. The Project Officer and the COR do not have the authority to issue technical direction which (1) institutes additional work outside the scope of either the contract or this Task Order Performance Work Statement; (2) constitutes a change as defined in the "Changes" clause; (3) causes an increase or decrease in the estimated cost of the contract or Task Order Performance Work Statement; (4) alters the period of performance; or (5) changes any of the other express terms or conditions of the contract or Task Order Performance Work Statement.*

*Technical direction will be issued in writing or confirmed in writing within five (5) calendar days after oral issuance. The Administrative Task Order Manager will provide the technical direction memorandum to the Contractor, with electronic copies to the Contracting Officer. If the Contractor has not received written confirmation within five (5) calendar days of an oral issuance, the Contractor must so notify the Administrative Task Order Manager.*

Thank you for your understanding on this.

Bob

**From:** Hanson, Kristen [<mailto:KHanson@ldftribe.com>]  
**Sent:** Monday, September 26, 2016 8:30 AM  
**To:** Faust, Matt <[mfaust@bristol-companies.com](mailto:mfaust@bristol-companies.com)>  
**Cc:** Egan, Robert <[egan.robert@epa.gov](mailto:egan.robert@epa.gov)>  
**Subject:** RE: Additional LIF data to Haskell Lake Model

Good Morning Matt,

Has the old VAS data been incorporated into the model? The reason I ask is that you had mentioned the need for definition on the eastern extent. VAS 04 is in the NE portion of the site, VAS 03 the SE portion of the site. The VAS borings include sampling data from multiple depths. The monitoring well data agrees with the old VAS data and may be particularly helpful near the lake and the eastern extent.

Kristen

**From:** Faust, Matt [<mailto:mfaust@bristol-companies.com>]  
**Sent:** Wednesday, September 14, 2016 11:20 AM  
**To:** Hanson, Kristen  
**Subject:** RE: Additional LIF data to Haskell Lake Model

Kristen,

Thank you, to my eye it looks like the data is all there now. I'll check with Jason to make sure they don't need anything else.

--Matt

**Matt Faust, P.G.**  
Project Manager/Geologist  
Bristol Environmental Remediation Services, LLC  
Phone : (907) 743-9346

**From:** Hanson, Kristen [<mailto:KHanson@ldftribe.com>]  
**Sent:** Tuesday, September 13, 2016 4:49 PM  
**To:** Faust, Matt <[mfaust@bristol-companies.com](mailto:mfaust@bristol-companies.com)>  
**Cc:** [jruf@s2c2inc.com](mailto:jruf@s2c2inc.com)  
**Subject:** RE: Additional LIF data to Haskell Lake Model

Good Afternoon Matt,

Thank you for the information and Jason's contact information. The ftp site was updated this evening with the data files.

Kristen

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: "Faust, Matt" <[mfaust@bristol-companies.com](mailto:mfaust@bristol-companies.com)>

Date: 09/13/2016 1:02 PM (GMT-06:00)

To: "Hanson, Kristen" <[KHanson@ldftribe.com](mailto:KHanson@ldftribe.com)>

Cc: [egan.robert@epa.gov](mailto:egan.robert@epa.gov)

Subject: RE: Additional LIF data to Haskell Lake Model

Hi Kristen,

Just an FYI, it looks like you have Jason Ruf's email address wrong in your email from Friday. Jason didn't receive this email until I forwarded it to him this morning. His correct email is [jruf@s2c2inc.com](mailto:jruf@s2c2inc.com).

I don't think it will be necessary for the LDF tribe to put S2C2 under contract for this task. They have indicated that there is sufficient budget remaining under their current subcontract with Bristol to incorporate the UVOST/LIF data into their model. It shouldn't take very much effort, considering they've already laid the groundwork, so it would probably be simplest to keep it all in one job. That wouldn't cause a problem for you, would it?

However, it looks like the data that is on the FTP site you sent is PDFs of the UVOST logs only. S2C2 will need the raw data or text/excel files with the actual data logs in order to incorporate the UVOST data into the model.

Thank you,

--Matt

**Matt Faust, P.G.**  
Project Manager/Geologist  
Bristol Environmental Remediation Services, LLC  
Phone : (907) 743-9346

**From:** Hanson, Kristen [<mailto:KHanson@ldftribe.com>]  
**Sent:** Friday, September 09, 2016 7:18 AM  
**To:** [ruf@s2c2inc.com](mailto:ruf@s2c2inc.com)  
**Cc:** Faust, Matt <[mfaust@bristol-companies.com](mailto:mfaust@bristol-companies.com)>; [egan.robert@epa.gov](mailto:egan.robert@epa.gov)  
**Subject:** Additional LIF data to Haskell Lake Model

Good Afternoon Jason,

LIF work was completed at the Haskell Lake site. I am interested in contracting your services to include this additional data in the Haskell Lake Work. Could you send a ballpark cost estimate so that I can execute a contract.

The LIF work was completed on Wednesday and Thursday. The survey work is being completed today. The data is being uploaded to Dakota's ftp site. The website login address and login is:

Username: colemaneng

Password: haskelllake221

FTP site address: <http://ftpfh.dakotatechnologies.com/~dakota/2016/0221.16>

*Kristen Hanson*

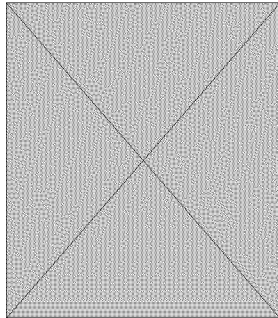
Environmental Specialist

Tribal Natural Resource Department

Lac du Flambeau Band of Lake Superior Chippewa Indians

*Phone: (715)588-4290*

*Cell: (715)614-4644*



**From:** Faust, Matt [<mailto:mfaust@bristol-companies.com>]

**Sent:** Tuesday, September 06, 2016 12:45 PM

**To:** Hanson, Kristen

**Cc:** [egan.robert@epa.gov](mailto:egan.robert@epa.gov)

**Subject:** RE: Data Clarification

Hi Kristen,

I hope that the email I sent a few minutes ago include the shapefiles that you needed – please let me know if not.

Jason Ruf's email address is: [jruf@s2c2inc.com](mailto:jruf@s2c2inc.com).

Good luck with your LIF program this week!

--Matt

**Matt Faust, P.G.**  
Project Manager/Geologist  
Bristol Environmental Remediation Services, LLC  
Phone : (907) 743-9346

**From:** Hanson, Kristen [<mailto:KHanson@ldftribe.com>]  
**Sent:** Tuesday, September 06, 2016 9:33 AM  
**To:** Faust, Matt <[mfaust@bristol-companies.com](mailto:mfaust@bristol-companies.com)>  
**Cc:** [egan.robert@epa.gov](mailto:egan.robert@epa.gov)  
**Subject:** RE: Data Clarification

Good Morning Matt,

Thanks for the pdf map example. You guessed right, the shape files for the data shown on the map you sent are the files I'm looking for.

I have been out of the loop for a bit, so I wasn't sure if there was a call planned with S2C2, it looked like one was being planned in the old emails. I sure do appreciate inclusion in the next web session, after the LIF data. I will need to get the data into the model, so I will need Jason's contact information.

Hope all is well in the great state of Alaska!

Kristen



**From:** Faust, Matt [<mailto:mfaust@bristol-companies.com>]  
**Sent:** Tuesday, September 06, 2016 11:23 AM  
**To:** Hanson, Kristen  
**Cc:** Egan, Robert  
**Subject:** RE: Data Clarification

Good morning Kristen,

I've attached a table with analytical results. These are pretty fresh and haven't been reviewed yet.

I've also attached a PDF of a site map that has all the boring locations – this is what you need a shapefile for, correct? I'll ask Noyuk this morning to generate one for you.

I can ask S2C2 to set up a web session. Would you care to wait until they've incorporated your LIF data into the model?

--Matt

**Matt Faust, P.G.**  
Project Manager/Geologist  
Bristol Environmental Remediation Services, LLC  
Phone : (907) 743-9346

**From:** Egan, Robert [<mailto:egan.robert@epa.gov>]  
**Sent:** Tuesday, September 06, 2016 7:32 AM  
**To:** Faust, Matt <[mfaust@bristol-companies.com](mailto:mfaust@bristol-companies.com)>  
**Subject:** FW: Data Clarification

Matt,

See below. Can you provide this to Kristen?

Bob Egan

Corrective Action Manager

Underground Storage Tanks Section

RCRA Branch

EPA Region 5

(312) 886-6212

(312) 692-2911 (fax)

**From:** Hanson, Kristen [<mailto:KHanson@ldftribe.com>]

**Sent:** Tuesday, September 06, 2016 10:24 AM

**To:** Egan, Robert <[egan.robert@epa.gov](mailto:egan.robert@epa.gov)>

**Cc:** Faust, Matt ([mfaust@bristol-companies.com](mailto:mfaust@bristol-companies.com)) <[mfaust@bristol-companies.com](mailto:mfaust@bristol-companies.com)>

**Subject:** Data Clarification

Bob,

Bristol did a wonderful job displaying several datasets (2016 Bristol Borehole, 2015 REI borehole, Lac du Flambeau Well, Monitoring Well, and Vertical Aquifer Sample) in their March 2016 figure that we used in the field during the MiHPT work. In addition to the MiHPT shapefile from the survey work, please send the shapefiles from the March figure.

Thanks,

Kristen

**From:** Egan, Robert [<mailto:egan.robert@epa.gov>]  
**Sent:** Tuesday, September 06, 2016 10:13 AM  
**To:** Hanson, Kristen  
**Cc:** Kamke, Sherry  
**Subject:** RE: MiHPT and LIF data for Tower

Hi Kristen,

I do not have the lab data yet. I will ask Bristol if they have heard anything yet. I will also ask them to send the Shape files to you.

There is no session yet scheduled with S2C2. I will check with Bristol on how to get this arranged. I know that Tom Kady is out until later this month for vacation. I would like him to participate in this if possible. He also suggested that we have REI arrange for their subcontractor to provide an overview session with their own interpretation of the data.

I hope the work goes well this week.

Bob Egan

Corrective Action Manager

Underground Storage Tanks Section

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EPA Region 5

(312) 886-6212

(312) 692-2911 (fax)

**From:** Hanson, Kristen [<mailto:KHanson@ldftribe.com>]

**Sent:** Tuesday, September 06, 2016 10:03 AM  
**To:** Egan, Robert <[egan.robert@epa.gov](mailto:egan.robert@epa.gov)>  
**Cc:** Faust, Matt ([mfaust@bristol-companies.com](mailto:mfaust@bristol-companies.com)) <[mfaust@bristol-companies.com](mailto:mfaust@bristol-companies.com)>  
**Subject:** RE: MiHPT and LIF data for Tower

Good Morning Bob,

Is there a web session with S2C2 scheduled?

Could you ask Bristol for

- 1) Shape files for the MiHpt borings
- 2) Lab Analytical for the sampled wells

I am preparing for LIF work tomorrow.

Thank you,

***Kristen Hanson***

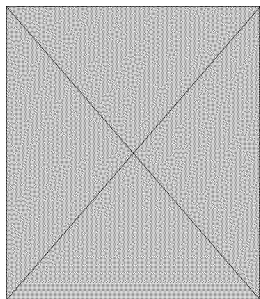
Environmental Specialist

Tribal Natural Resource Department

Lac du Flambeau Band of Lake Superior Chippewa Indians

*Phone: (715)588-4290*

*Cell: (715)614-4644*



**From:** Faust, Matt [<mailto:mfaust@bristol-companies.com>]  
**Sent:** Wednesday, August 24, 2016 12:17 PM  
**To:** Egan, Robert  
**Cc:** Kady, Thomas; Hanson, Kristen  
**Subject:** RE: MiHPT and LIF data for Tower

Bob,

I've sent an email to S2C2 to see about getting those 4DIM files. Also, I forgot to mention that Jason offered to host another web session for anybody that would like to see what he's been working on, though he did say he'd be out most of the rest of the week, returning next week.

--Matt

**Matt Faust, P.G.**  
Project Manager/Geologist  
Bristol Environmental Remediation Services, LLC  
Phone : (907) 743-9346

**From:** Egan, Robert [<mailto:egan.robert@epa.gov>]  
**Sent:** Wednesday, August 24, 2016 5:39 AM

**To:** Faust, Matt <mfaust@bristol-companies.com>  
**Cc:** Kady, Thomas <Kady.Thomas@epa.gov>; KHanson@ldftribe.com  
**Subject:** FW: MiHPT and LIF data for Tower

Matt:

Please see Tom's message below and let me know when we can see the information he references.

Thank you.

Bob Egan

Corrective Action Manager

Underground Storage Tanks Section

RCRA Branch

EPA Region 5

(312) 886-6212

(312) 692-2911 (fax)

**From:** Kady, Thomas  
**Sent:** Wednesday, August 24, 2016 8:23 AM  
**To:** Egan, Robert <egan.robert@epa.gov>  
**Cc:** KHanson@ldftribe.com  
**Subject:** Re: MiHPT and LIF data for Tower

I agree with all of Jason and Matt's suggestions. I would like to see S2C2's visualization for the MIHPT work. We can wait for the final report until after the LIF work, but it would be good to see the 4-dims as soon as they are ready. That will help guide the LIF work.

Tom

Sent from my iPhone

On Aug 24, 2016, at 7:54 AM, Egan, Robert <[egan.robert@epa.gov](mailto:egan.robert@epa.gov)> wrote:

Kristen and Tom:

Please see Matt's message below with some recommendations from S2C2 on LIF locations.

I do not mind waiting to include the LIF data into the S2C2 model. Please let me know what you think about it and I will pass your messages on to Matt.

Thank you

Bob Egan

Corrective Action Manager

Underground Storage Tanks Section

RCRA Branch

EPA Region 5

(312) 886-6212

(312) 692-2911 (fax)

**From:** Faust, Matt [<mailto:mfaust@bristol-companies.com>]

**Sent:** Tuesday, August 23, 2016 3:41 PM

**To:** Egan, Robert <[egan.robert@epa.gov](mailto:egan.robert@epa.gov)>

**Cc:** Edwards, Christine <[Edwards.Christine@epa.gov](mailto:Edwards.Christine@epa.gov)>; Ruth, Scott <[sruth@bristol-](mailto:sruth@bristol-)

[companies.com](#)>

**Subject:** MiHPT and LIF data for Tower

PLEASE NOTE THE EPA AND CONTRACTORS ARE RECEIVING THIS EMAIL

Hi Bob,

I wanted to let you know that I had a web meeting with S2C2 (our MiHPT data visualization contractor) this morning and got to see how their model is coming together. In general I would say that it's impressive.

We talked about how the LDF Tribe has an LIF study planned for next week and considered whether S2C2 should hold off on finalizing their report incorporate the pending LIF data into the model. I thought that would probably be worth the wait but thought I better check with you and potentially Kristen.

In regards to suggestions for objectives for the LIF study, Jason (from S2C2) thought the probes would be best used in the source area (as I believe Kristen is planning) with a special emphasis on finding the bottom of the impacted zone. LIF will be most effective in the source area because it will not see dissolved phase contamination at all.

The other suggestion that Jason had was to perhaps drive LIF probes at the same locations as MiHPT locations 14 and 15. Both of those probes had some FID response at a shallower depth than expected (10-16 feet) that was not associated with significant PID response. In both borings there was relative high in HPT pressure in these intervals as well, and S2C2 is question whether they may be some sort of matrix effect. If LDF has the time available during their LIF study, it might be worth checking out these two spots. It would be even better if soil samples could be collected from these intervals.

Thank you,



--Matt

**Matt Faust, P.G.**

Project Manager/Geologist  
Bristol Environmental Remediation Services, LLC  
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Anchorage, AK 99501-5109  
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